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UBER TECHNOLOGIES, INC.  
17 and OTTOMOTTO LLC

18 UNITED STATES DISTRICT COURT  
19 NORTHERN DISTRICT OF CALIFORNIA  
20 SAN FRANCISCO DIVISION

21 WAYMO LLC,  
22 Plaintiff,  
23 v.  
24 UBER TECHNOLOGIES, INC.,  
25 OTTOMOTTO LLC; OTTO TRUCKING LLC,  
26 Defendants.

Case No. 3:17-cv-00939-WHA

**DEFENDANTS UBER  
TECHNOLOGIES, INC. AND  
OTTOMOTTO LLC'S  
ADMINISTRATIVE MOTION TO  
FILE UNDER SEAL THE  
DECLARATION OF KEVIN  
FAULKNER REGARDING GOOGLE  
DRIVE AND GMAIL MIGRATION**

Pursuant to Civil Local Rules 7-11 and 79-5, Defendants Uber Technologies, Inc. and Ottomotto LLC (“Defendants”) submit this motion for an order to file under seal the Declaration of Kevin Faulkner Regarding Google Drive and Gmail Migration. Specifically, Defendants request an order granting leave to file under seal the confidential portions of the following documents:

Document	Portions to Be Filed Under Seal	Designating Party
Declaration of Kevin Faulkner Regarding Google Drive and Gmail Migration (“Faulkner Declaration”)	Highlighted Portions	Defendants

The blue-highlighted portions of the Faulkner Declaration contain contact information of a former employee. Defendants request this information be kept under seal to protect the privacy interests of a person involved in this litigation, which is currently the subject of extensive media coverage. (Declaration of Michelle Yang in Support of Defendants’ Administrative Motion to File Documents Under Seal (“Yang Decl.”) ¶ 3.) The blue-highlighted portions also contain a placeholder domain name used for migration of electronic information. Disclosure of this information could allow others to attempt to compromise the security of Uber’s internal electronic information systems by targeting specific placeholder domain names. (Yang Decl. ¶ 4.)

Pursuant to Civil Local Rule 79-5(d)(2), Defendants will lodge with the Clerk the documents at issue, with accompanying chamber copies.

Defendants served Waymo with this Administrative Motion to File Documents Under Seal on September 29, 2017.

For the foregoing reasons, Defendants request that the Court enter the accompanying Proposed Order granting Defendants’ Administrative Motion to File Documents Under Seal and designate the service copies of these documents as “CONFIDENTIAL.”

1 Dated: September 29, 2017

MORRISON & FOERSTER LLP

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3 By: /s/ Arturo J. González  
ARTURO J. GONZÁLEZ

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5 UBER TECHNOLOGIES, INC. and  
6 OTTOMOTTO LLC  
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